

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION CHICAGO**

In Re: Case No. 16-34776

Sharon E Halfpenny Chapter 13

Debtor. Hon. Judge Deborah L. Thorne

**RESPONSE TO OBJECTION TO NOTICE OF MORTGAGE PAYMENT CHANGE
(DOC. 80)**

U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES IV TRUST BY ITS SERVICER SN SERVICING CORPORATION (“Creditor”), by and through their undersigned counsel, hereby files this response to the Debtor’s Objection to Notice of Mortgage Payment Change.

Creditor began servicing this loan on December 20, 2019. Creditor’s system notes indicate that Creditor spoke directly with Debtor Counsel as early as January 18, 2019, and that Debtor Counsel was aware that any insurance information needed to go to Creditor.

On February 20, 2020, Creditor also filed its Transfer of Claim indicating that SN Servicing Corporation was the new loan servicer.

01/18/2020 snt the auth to be scanned and updated contacts
From: Joseph Davidson
Sent: Monday, January 6, 2020 1:32 PM
To: Watson, Kathy
Cc: Mohammed Badwan
Subject: RE: Halfpenny

Good Afternoon Kathy:

Pleasure speaking this afternoon. As discussed, attached, please find

authorization to send Mortgage Statements and other correspondence directly to Mr. and Mrs. Halfpenny. Please feel free to contact me directly with your additional concerns or questions. Have a wonderful afternoon.

Regards,

Joseph S. Davidson
Attorney
ATLAS CONSUMER LAW, A DIVISION OF SULAIMAN LAW GROUP, LTD.
2500 South Highland Avenue, Suite 200
Lombard, Illinois 60148
D: +1 630-581-5450
F: +1 630-575-8188

03/25/2020 From: Her, Phoua
Sent: Wednesday, March 25, 2020 2:35 PM
To: 'Yasmeen.Nofal@il.cslegal.com'
Subject: FW: Codilis & Associates, P.C. (IL) FOLLOW-UP***1098 IRS interest needed*** Halfpenny, Sharon
Importance: High

Hi Yasmeen,

The account number for this case is

I attached the 1098 from prior servicer.
This account transferred to SN Servicing Corp on 12/20/2019-
If the borrower paid less than \$500 in interest- we do not generate a 1098 for the year.
We did not generate a 1098 for them.

Let me know if you have any other questions.

From: Viale, Angela
Sent: Wednesday, March 25, 2020 3:29 PM
To: 'Yasmeen.Nofal@il.cslegal.com'
Cc: Her, Phoua
Subject: RE: Codilis & Associates, P.C. (IL) FOLLOW-UP***1098 IRS interest needed*** Halfpenny, Sharon

Hello,

We boarded this loan on 12/20/2019

The debtor should be able to get their 1098 form from the Prior Servicer however, I did find the attached that was forwarded from Mr Coope

WHEREFORE, Creditor and/or its assigns prays this Court overrule the Debtor's Objection to Notice of Mortgage Payment Change, and for such other and further relief as this Court may deem just and proper.

Respectfully Submitted,

/s/ Jon J. Lieberman

Jon J. Lieberman (OH 0058394)
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Email: bankruptcy@sottileandbarile.com
Attorney for Creditor

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that I have served a copy of this Response upon the above-named parties by electronic filing or, as noted below, by placing same in a properly addressed and sealed envelope, postage prepaid, and depositing it in the United States Mail at 394 Wards Corner Rd., Suite 180, Loveland, OH 45140 on June 22, 2020, before the hour of 5:00 p.m.

Joseph S Davidson, Debtor's Counsel at jdavidson@sulaimanlaw.com

Marilyn O. Marshall, Trustee at courtdocs@chi13.com

Patrick S Layng, U.S. Trustee at USTPRegion11.ES.ECF@usdoj.gov

Sharon E Halfpenny, P.O. Box 289, Amboy, IL 61310

/s/ Jon J. Lieberman

Jon J. Lieberman (OH 0058394)
Attorney for Creditor